## State Bar Court of California **Hearing Department** Los Angeles REPROVAL Counsel For The State Bar For Court use only Case Number(s): 12-C-15461-DFM PUBLIC MATTER Hugh G. Radigan Deputy Trial Counsel 1149 S. Hill St. Los Angeles, CA 90015 (213) 765-1206 FILED MAY 16 2013 Bar # 94251 STATE BAR COURT Counsel For Respondent CLERK'S OFFICE LOS ANGELES Arthur L. Margolis 2000 Riverside Drive Los Angeles, California 90039-3758 323-953-8996 Submitted to: Settlement Judge STIPULATION RE FACTS, CONCLUSIONS OF LAW AND Bar # 57703 DISPOSITION AND ORDER APPROVING In the Matter of: SIMON YOUNG SONG **PUBLIC REPROVAL** PREVIOUS STIPULATION REJECTED Bar # 283269 A Member of the State Bar of California (Respondent)

Note: All information required by this form and any additional information which cannot be provided in the space provided, must be set forth in an attachment to this stipulation under specific headings, e.g., "Facts," "Dismissals," "Conclusions of Law," "Supporting Authority," etc.

# A. Parties' Acknowledgments:

- (1) Respondent is a member of the State Bar of California, admitted June 6, 2012.
- (2) The parties agree to be bound by the factual stipulations contained herein even if conclusions of law or disposition are rejected or changed by the Supreme Court.
- (3) All investigations or proceedings listed by case number in the caption of this stipulation are entirely resolved by this stipulation and are deemed consolidated. Dismissed charge(s)/count(s) are listed under "Dismissals." The stipulation consists of 12 pages, not including the order.
- (4) A statement of acts or omissions acknowledged by Respondent as cause or causes for discipline is included upder "Facts."

(Effective January 1, 2011)

Reproval

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(5)	Conclusions of law, drawn from and specifically referring to the facts are also included under "Conclusions of				
/ë\	Law".  The parties must include supporting authority for the recommended level of discipline under the heading				
(6)		"Supporting Authority."			
(7)		No more than 30 days prior to the filing of this stipulation, Respondent has been advised in writing of any pending investigation/proceeding not resolved by this stipulation, except for criminal investigations.			
(8)	Payment of Disciplinary Costs—Respondent acknowledges the provisions of Bus. & Prof. Code §§6086.10 & 6140.7. (Check one option only):				
			osts are added to membership fee for calendar year following effective date of discipline (public proval).		
		Ca be ef ca ab	isse ineligible for costs (private reproval).  Issessineligible for costs (private reproval).  Is epoid in equal amounts prior to February 1 for the following two billing cycles following the fective date of the Hearing Department's order (Hardship, special circumstances or other good use per rule 5.132, Rules of Procedure.) If Respondent fails to pay any installment as described ove, or as may be modified by the State Bar Court, the remaining balance is due and payable mediately.		
		Co	osts are waived in part as set forth in a separate attachment entitled "Partial Waiver of Costs".  Instructions of the control		
(9)	The	parti	es understand that:		
	(a)		A private reproval imposed on a respondent as a result of a stipulation approved by the Court prior to initiation of a State Bar Court proceeding is part of the respondent's official State Bar membership records, but is not disclosed in response to public inquiries and is not reported on the State Bar's web page. The record of the proceeding in which such a private reproval was imposed is not available to the public except as part of the record of any subsequent proceeding in which it is introduced as evidence of a prior record of discipline under the Rules of Procedure of the State Bar.		
	(b)		A private reproval imposed on a respondent after initiation of a State Bar Court proceeding is part of the respondent's official State Bar membership records, is disclosed in response to public inquiries and is reported as a record of public discipline on the State Bar's web page.		
	(c)	$\boxtimes$	A public reproval imposed on a respondent is publicly available as part of the respondent's official State Bar membership records, is disclosed in response to public inquiries and is reported as a record of public discipline on the State Bar's web page.		
Pro	-	iona	ing Circumstances [for definition, see Standards for Attorney Sanctions for all Misconduct, standard 1.2(b)]. Facts supporting aggravating circumstances I.		
(1)		Prio	r record of discipline [see standard 1.2(f)]		
	(a)		State Bar Court case # of prior case		
	(b)		Date prior discipline effective		
	(c)		Rules of Professional Conduct/ State Bar Act violations:		
	(d)		Degree of prior discipline		

(Do not write above this line.)				
	(e)	If Respondent has two or more incidents of prior discipline, use space provided below or a separate attachment entitled "Prior Discipline.		
(2)		<b>Dishonesty:</b> Respondent's misconduct was surrounded by or followed by bad faith, dishonesty, concealment, overreaching or other violations of the State Bar Act or Rules of Professional Conduct.		
(3)		<b>Trust Violation:</b> Trust funds or property were involved and Respondent refused or was unable to account to the client or person who was the object of the misconduct for improper conduct toward said funds or property.		
(4)		Harm: Respondent's misconduct harmed significantly a client, the public or the administration of justice.		
(5)		Indifference: Respondent demonstrated indifference toward rectification of or atonement for the consequences of his or her misconduct.		
(6)		Lack of Cooperation: Respondent displayed a lack of candor and cooperation to victims of his/her misconduct or to the State Bar during disciplinary investigation or proceedings.		
(7)		Multiple/Pattern of Misconduct: Respondent's current misconduct evidences multiple acts of wrongdoing or demonstrates a pattern of misconduct.		
(8)	$\boxtimes$	No aggravating circumstances are involved.		
Addi	itiona	al aggravating circumstances:		
	-	ating Circumstances [see standard 1.2(e)]. Facts supporting mitigating tances are required.		
(1)		<b>No Prior Discipline:</b> Respondent has no prior record of discipline over many years of practice coupled with present misconduct which is not deemed serious.		
(2)		No Harm: Respondent did not harm the client or person who was the object of the misconduct.		
(3)		Candor/Cooperation: Respondent displayed spontaneous candor and cooperation with the victims of his/her misconduct and to the State Bar during disciplinary investigation and proceedings.		
(4)		Remorse: Respondent promptly took objective steps spontaneously demonstrating remorse and recognition of the wrongdoing, which steps were designed to timely atone for any consequences of his/her misconduct.		
(5)		<b>Restitution:</b> Respondent paid \$ on in restitution to without the threat or force of disciplinary, civil or criminal proceedings.		
(6)		<b>Delay:</b> These disciplinary proceedings were excessively delayed. The delay is not attributable to Respondent and the delay prejudiced him/her.		
(7)		Good Faith: Respondent acted in good faith.		
(8)		Emotional/Physical Difficulties: At the time of the stipulated act or acts of professional misconduct Respondent suffered extreme emotional difficulties or physical disabilities which expert testimony would		

(Do n	ot writ	e above this	line;)		
		any illega	was directly responsible for the misconduct. The difficulties or disabilities were not the product or all conduct by the member, such as illegal drug or substance abuse, and Respondent no longer from such difficulties or disabilities.		
(9)		which res	Financial Stress: At the time of the misconduct, Respondent suffered from severe financial stres sulted from circumstances not reasonably foreseeable or which were beyond his/her control and are directly responsible for the misconduct.		
(10)			Problems: At the time of the misconduct, Respondent suffered extreme difficulties in his/her life which were other than emotional or physical in nature.		
(11)			Good Character: Respondent's good character is attested to by a wide range of references in the legal and general communities who are aware of the full extent of his/her misconduct.		
(12)		Rehabilitation: Considerable time has passed since the acts of professional misconduct occurred followed by convincing proof of subsequent rehabilitation.			
(13)		No mitig	ating circumstances are involved.		
Addi	tion	al mitigati	ng circumstances:		
		See Stip	oulation page 9.		
D. C	)isc	pline:			
(1)		Private r	eproval (check applicable conditions, if any, below)		
	(a)	☐ App	proved by the Court prior to initiation of the State Bar Court proceedings (no public disclosure).		
<u>or</u>	(b)	☐ App	proved by the Court after initiation of the State Bar Court proceedings (public disclosure).		
(2)	$\boxtimes$	Public reproval (Check applicable conditions, if any, below)			
E. C	ond	itions A	ttached to Reproval:		
(1)	$\boxtimes$	Respond	ent must comply with the conditions attached to the reproval for a period of one year.		
(2)	☒	During th State Bar	e condition period attached to the reproval, Respondent must comply with the provisions of the Act and Rules of Professional Conduct.		
(3)		State Bar information	n (10) days of any change, Respondent must report to the Membership Records Office of the and to the Office of Probation of the State Bar of California ("Office of Probation"), all changes of on, including current office address and telephone number, or other address for State Bar, as prescribed by section 6002.1 of the Business and Professions Code.		
(4)		and sche conditions probation	rty (30) days from the effective date of discipline, Respondent must contact the Office of Probation dule a meeting with Respondent's assigned probation deputy to discuss these terms and sof probation. Upon the direction of the Office of Probation, Respondent must meet with the deputy either in-person or by telephone. During the period of probation, Respondent must meet with the probation deputy as directed and upon request.		
(5)		July 10, a	ent must submit written quarterly reports to the Office of Probation on each January 10, April 10, and October 10 of the condition period attached to the reproval. Under penalty of perjury, ent must state whether Respondent has complied with the State Bar Act, the Rules of		

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		Bar (	Court and if so, the case number and cu	urrent state	proceedings pending against him or her in the State us of that proceeding. If the first report would cover d on the next following quarter date, and cover the
		In ad twent perio	ty (20) days before the last day of the o	oort, conta condition p	ning the same information, is due no earlier than eriod and no later than the last day of the condition
(6) <sub>1</sub>		Respondent must be assigned a probation monitor. Respondent must promptly review the terms and conditions of probation with the probation monitor to establish a manner and schedule of compliance. During the period of probation, Respondent must furnish such reports as may be requested, in addition to the quarterly reports required to be submitted to the Office of Probation. Respondent must cooperate fully with the monitor.			
(7)		Subject to assertion of applicable privileges, Respondent must answer fully, promptly and truthfully any inquiries of the Office of Probation and any probation monitor assigned under these conditions which are directed to Respondent personally or in writing relating to whether Respondent is complying or has complied with the conditions attached to the reproval.			
(8)	$\boxtimes$	Within one (1) year of the effective date of the discipline herein, Respondent must provide to the Office of Probation satisfactory proof of attendance at a session of the Ethics School, and passage of the test given at the end of that session.			
			No Ethics School recommended. Rea	ason:	
(9)		Respondent must comply with all conditions of probation imposed in the underlying criminal matter and must so declare under penalty of perjury in conjunction with any quarterly report to be filed with the Office of Probation.			
(10)		Respondent must provide proof of passage of the Multistate Professional Responsibility Examination ("MPRE"), administered by the National Conference of Bar Examiners, to the Office of Probation within one year of the effective date of the reproval.			
		ent do	No MPRE recommended. Reason: The not require passage of the MPRE i Cal. Bar Ct. Rptr. 181, 184	e protecti n this cas	on of the public and the interests of the e. See In the Matter of Respondent G (Review
(11)	$\boxtimes$	The f	following conditions are attached hereto	and inco	porated:
		$\boxtimes$	Substance Abuse Conditions		Law Office Management Conditions
			Medical Conditions		Financial Conditions
F. C	the	r Cor	nditions Negotiated by the Par	ties:	

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In the Matter of: SIMON YOUNG SONG.  Case Number(s): 12-C-15461-DFM					
S	ubs	tance	Abuse Conditions		
a,	$\boxtimes$	Respondent must abstain from use of any alcoholic beverages, and shall not use or possess any narcotics, dangerous or restricted drugs, controlled substances, marijuana, or associated paraphernalia, except with a valid prescription.			
b.	$\boxtimes$	Respo	ndent must attend at least four meetings per	month of:	
			Alcoholics Anonymous		
			Narcotics Anonymous		
			The Other Bar		
	Other program Any abstinence-based, self-help group of Respondent's own choosing, including inter alia, Alcoholics Anonymous, Narcotics Anonymous, LifeRing, S.M.A.R.T., S.O.S., etc. Other self-help maintenance programs are acceptable if they include: (i) a subculture to support recovery (meetings); and (ii) a process of personal development that does not have financial barriers. (See O'Connor v. Calif. (C.D. Calif. 1994) 855 F. Supp. 303 [No first amendement violation where probationer given choice between AA and secular program.]) The program called "Moderation Management" is not acceptable because it allows the participant to continue consuming alcohol. Before Respondent attends the first self-help group meeting, Respondent must contact the Office of Probation and obtain approval for the program Respondent selected. If Respondent wants to change groups, Respondent must obtain the Office of Probation's approval prior to attending a meeting with the new self-help group.				
		attenda	eparate reporting requirement, Respondent nance during each month, on or before the ten on period.	nust provide to the Office of Probation satisfactory proof of th (10 <sup>th</sup> ) day of the following month, during the condition or	
C.		Respondent must select a license medical laboratory approved by the Office of Probation. Respondent must furnish to the laboratory blood and/or urine samples as may be required to show that Respondent has abstained from alcohol and/or drugs. The samples must be furnished to the laboratory in such a manner as may be specified by the laboratory to ensure specimen integrity. Respondent must cause the laboratory to provide to the Office of Probation, at the Respondent's expense, a screening report on or before the tenth day of each month of the condition or probation period, containing an analysis of Respondent's blood and/or urine obtained not more than ten (10) days previously.			
d.		Respondent must maintain with the Office of Probation a current address and a current telephone number at which Respondent can be reached. Respondent must return any call from the Office of Probation concerning testing of Respondent's blood or urine within twelve (12) hours. For good cause, the Office of Probation may require Respondent to deliver Respondent's urine and/or blood sample(s) for additional reports to the laboratory described above no later than six hours after actual notice to Respondent that the Office of Probation requires an additional screening report.			
e.				dent must provide the Office of Probation with medical ecords. Revocation of any medical waiver is a violation of	

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this condition. Any medical records obtained by the Office of Probation are confidential and no information concerning them or their contents will be given to anyone except members of the Office of Probation, Office of the Chief Trial Counsel, and the State Bar Court who are directly involved with maintaining, enforcing or adjudicating this condition.

Other:

### **ATTACHMENT TO**

## STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION

IN THE MATTER OF:

Simon Young Song

CASE NUMBER:

12-C-15461 DFM

#### FACTS AND CONCLUSIONS OF LAW.

Respondent admits that the following facts and circumstances surrounding his criminal conviction do not involve moral turpitude, but do warrant discipline.

## Case No. 12-C-15461(Conviction Proceedings)

## PROCEDURAL BACKGROUND IN CONVICTION PROCEEDING:

- 1. This is a proceeding pursuant to sections 6101 and 6102 of the Business and Professions Code and rule 9.10 of the California Rules of Court.
- 2. On September 7, 2012, Respondent entered a plea of guilty to the violation of California Vehicle Code section 23152(b) [driving with blood alcohol level over .08%].
- 3. On September 7, 2012, Respondent was placed on probation for the violation of California Vehicle Code section 23152(b) [driving with blood alcohol level over .08%] for a period of 5 years.
- 4. On February 7, 2013, the Review Department of the State Bar Court issued an order referring the matter to the Hearing Department for a hearing and decision recommending the discipline to be imposed in the event that the Hearing Department finds that the facts and circumstances surrounding the offense(s) for which Respondent was convicted involved moral turpitude or other misconduct warranting discipline.

#### FACTS:

- 5. Respondent was previously convicted of a violation of California Vehicle Code section 23103(a) [reckless driving-alcohol related] in San Diego Superior Court on February 10, 2009.
- 6. On June 9, 2012, at approximately 8:54 p.m. an officer of the San Diego Police Department observed Respondent's traveling eastbound on Law Street and enter the intersection of Ingraham Street. The officer was headed northbound on Ingraham Street and had the right of way entering the subject intersection. The intersection of Law Street and Ingraham Street is controlled by two stop signs which control east and west bound traffic on Law Street entering the intersection. Respondent's vehicle failed to yield requiring the officer to brake to avoid a collision with Respondent's vehicle.
- 7. Respondent was subsequently contacted by the officer and observed to exhibit objective signs and symptoms of being under the influence of alcohol.

- 8. Respondent initially denied consuming alcoholic beverages that day to the officer that stopped him, but later acknowledged having consumed two beers to the officer conducting the field sobriety testing.
- 9. Another officer who had arrived at the scene administered a series of field sobriety tests, which Respondent did not successfully complete.
  - 10. The officers placed Respondent under arrest.
  - 11. Respondent's blood alcohol content measured at .17%.
- 12. On July 19, 2012, a misdemeanor complaint was filed against Respondent in San Diego Superior Court charging him with misdemeanor violations of California Vehicle Code sections 23152(a) [driving under the influence] and 23152(b) [driving with a blood alcohol level of .08% or higher].
- 13. On September 7, 2012, Respondent entered a plea of guilty to violation of California Vehicle Code section 23152(b) [driving with a blood alcohol level of .08% or higher]. Count one charging Respondent with a violation of Vehicle Code section 23152(a) [driving under the influence] was dismissed as part of the plea.
- 14. On September 7, 2012, Respondent was sentenced for the violation of California Vehicle Code section 23152(a) [driving under the influence]. Respondent was placed on five years summary probation subject to terms and conditions of that probation.

#### CONCLUSIONS OF LAW:

15. The facts and circumstances surrounding the above-described violation(s) did not involve moral turpitude but did involve other misconduct warranting discipline.

#### ADDITIONAL FACTS RE MITIGATING CIRCUMSTANCES.

Candor/Cooperation: Respondent has cooperated with the State Bar in this matter, and has entered into a stipulated settlement of this matter obviating the need for a trial. Such cooperation is deserving of consideration. (Silva-Vidor v. State Bar (1989) 49 Cal. 3d 1071, 1079.)

## AUTHORITIES SUPPORTING DISCIPLINE.

The Standards for Attorney Sanctions for Professional Misconduct provide a "process of fixing discipline" pursuant to a set of written principles to "better discharge the purposes of attorney discipline as announced by the Supreme Court." (Rules Proc. of State Bar, tit. IV, Stds. for Atty. Sanctions for Prof. Misconduct, Introduction (all further references to standards are to this source).) The primary purposes of disciplinary proceedings and of the sanctions imposed are "the protection of the public, the courts and the legal profession; the maintenance of high professional standards by attorneys and the preservation of public confidence in the legal profession." (In re Morse (1995) 11 Cal.4th 184, 205; std 1.3.)

Although not binding, the standards are entitled to "great weight" and should be followed "whenever possible" in determining level of discipline. (In re Silverton (2005) 36 Cal.4th 81, 92, quoting In re Brown (1995) 12 Cal.4th 205, 220 and In re Young (1989) 49 Cal.3d 257, 267, fn. 11.) Adherence to the standards in the great majority of cases serves the valuable purpose of eliminating disparity and assuring

consistency, that is, the imposition of similar attorney discipline for instances of similar attorney misconduct. (In re Naney (1990) 51 Cal.3d 186, 190.) Any discipline recommendation different from that set forth in the applicable standards should clearly explain the reasons for the deviation. (Blair v. State Bar (1989) 49 Cal.3d 762, 776, fn. 5.)

Standard 3.4 provides that conviction of a crime not involving moral turpitude but involving other misconduct warranting discipline shall result in a sanction prescribed under part B of the Standards as appropriate to the nature and extent of the misconduct. In reference to part B of the Standards, the most appropriate standard to apply is Standard 2.10. Standard 2.10 calls for a range of sanctions from reproval to suspension accounting for the gravity of the offense, harm to the victim, and with consideration given to the purposes of attorney discipline set forth in Standard 1.3.

Here the gravity of the offense is reflected in Respondent's choice to drive his vehicle while under the influence of alcohol. The seriousness of the offense is compounded by Respondent's prior conviction for a violation of California Vehicle Code section 23103(a) [reckless driving-alcohol related] on February 10, 2009. Respondent has failed to conform his behavior to the standards set by the criminal law on two successive occasions over a period of four years resulting first in a conviction for a violation of California Vehicle Code section 23103(a) [reckless driving-alcohol related] on February 10, 2009, and then in his most recent guilty plea to violation of California Vehicle Code section 23152(b) [driving with a blood alcohol level of .08% or higher]. While neither of these convictions caused direct harm to Respondent's clients nor occurred within the course of Respondent's practice of law, this pattern of behavior, evidencing as it does a disregard for the law and indifference to the potential danger to the public, merits discipline which is aimed to ensure that his misconduct does not recur. As such, discipline in the form of a public reproval is appropriate to meet the goals of discipline and sufficient to protect the public.

This level of discipline is consistent with case law. The Supreme Court in *In re Kelley* (1990) 52 Cal. 3rd 487, imposed discipline upon an attorney as a result of that attorney's second conviction for a violation of California Vehicle Code section 23152(b) on the basis that the conviction involved other misconduct warranting discipline. Kelley accumulated two separate convictions for violations of California Vehicle Code section 23152(b) over the span of a few years, incurring the second such conviction while she was on probation for the first conviction. (*Id.* at p. 491-492.) The Court in *Kelley* stated "Although it is true that petitioner's misconduct caused no harm to her clients, this fact alone does not insulate her from discipline aimed at ensuring that her potentially harmful misconduct does not recur." (*Id.* at p. 496.) Finding significant mitigation the Court publicly reproved Kelley as a result of her second conviction for a violation of California Vehicle Code section 23152(b). (*Id.* at p. 499.)

#### PENDING PROCEEDINGS.

The disclosure date referred to, on page 2, paragraph A(7), was April 19, 2013.

#### COSTS OF DISCIPLINARY PROCEEDINGS.

Respondent acknowledges that the Office of the Chief Trial Counsel has informed respondent that as of November 16, 2012, the prosecution costs in this matter are \$2,343.00. Respondent further acknowledges that should this stipulation be rejected or should relief from the stipulation be granted, the costs in this matter may increase due to the cost of further proceedings.

# **EXCLUSION FROM MCLE CREDIT**

Pursuant to rule 3201, Respondent may <u>not</u> receive MCLE credit for completion of State Bar Ethics School. (Rules Proc. of State Bar, rule 3201.)

(Do not write above this line.)		
In the Matter of: SIMON YOUNG SONG	Case number(s): 12-C-15461-DFM	

## SIGNATURE OF THE PARTIES

By their signatures below, the parties and their counsel, as applicable, signify their agreement with each of the recitations and each of the terms and conditions of this Stipulation Re Facts, Conclusions of Law, and Disposition.

5/8/2013	198	Simon Young Song
Date	Respondent's Signature	Print Name
5/10/13	tellar I. Margales	Arthur L. Margolis
Date	Respondent's Counsel Signature	Print Name
May 10 13	Deputy Trial Counsel's Signature	Hugh G. Radigan
Date	Dehart Louisers Signature	Print Name

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In the Matte SIMON Y	er of: OUNG SONG	Case Number(s): 12-C-15461-DFM			
	REPR	ROVAL ORDER			
Finding that attached to to prejudice, an	he reproval, IT IS ORDERED that the rec	nt the interests of Respondent will be served by any conditions quested dismissal of counts/charges, if any, is GRANTED without			
X	The stipulated facts and disposition are	APPROVED AND THE REPROVAL IMPOSED.			
	The stipulated facts and disposition are REPROVAL IMPOSED.	APPROVED AS MODIFIED as set forth below, and the			
	All court dates in the Hearing Departme	int are vacated,			
within 15 day stipulation. (S	The parties are bound by the stipulation as approved unless: 1) a motion to withdraw or modify the stipulation, filed within 15 days after service of this order, is granted; or 2) this court modifies or further modifies the approved stipulation. (See rule 5.58(E) & (F), Rules of Procedure.) Otherwise the stipulation shall be effective 15 days after service of this order.				
Failure to co proceeding f	mply with any conditions attached to our willful breach of rule 1-110, Rules o	this reproval may constitute cause for a separate f Professional Conduct.			
	6/13	Quallethe			
Date	Ju	dge of the State Bar Court			
		DONALD F. MILES			
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Reproval Order

#### CERTIFICATE OF SERVICE

[Rules Proc. of State Bar; Rule 5.27(B); Code Civ. Proc., § 1013a(4)]

I am a Case Administrator of the State Bar Court of California. I am over the age of eighteen and not a party to the within proceeding. Pursuant to standard court practice, in the City and County of Los Angeles, on May 16, 2013, I deposited a true copy of the following document(s):

STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND ORDER APPROVING

in a sealed envelope for collection and mailing on that date as follows:

by first-class mail, with postage thereon fully prepaid, through the United States Postal Service at Los Angeles, California, addressed as follows:

ARTHUR LEWIS MARGOLIS MARGOLIS & MARGOLIS LLP 2000 RIVERSIDE DR LOS ANGELES, CA 90039

by interoffice mail through a facility regularly maintained by the State Bar of California addressed as follows:

HUGH RADIGAN, Enforcement, Los Angeles

I hereby certify that the foregoing is true and correct. Executed in Los Angeles, California, on May 16, 2013.

Rose M. Luthi Case Administrator State Bar Court